

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN NEW YORK

D. George Sweigert, Plaintiff v. Jason Goodman, dba Crowd Source The Truth, dba 21st Century 3D, Defendants	PRO SE 23-cv-06881-UA 23-cv-05875-LTS
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NOTICE OF MOTION TO CONSOLIDATE RELATED S.D.N.Y. ACTIONS

Pro se Plaintiff, D. George Sweigert, hereby moves to consolidate the two above-captioned actions, which arise from the same related issues, albeit one action was filed in the Eastern District of Michigan (M.I.E.D.) in November 2022 and was transferred to the S.D.N.Y. on 08/04/2023 (23-cv-06881-UA). No briefing schedule has yet been issued in either matter, and the undersigned respectfully asks that a single briefing and argument schedule govern the matter as consolidated.

August 6, 2023 (08/06/2023)



**D. G. SWEIGERT PRO SE PLAINTIFF, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

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NOTICE OF MOTION TO CONSOLIDATE RELATED S.D.N.Y. ACTIONS

INTRODUCTION

1. Pro se Plaintiff, D. George Sweigert, hereby moves to consolidate the two above-captioned actions, which arise from the same related issues, albeit one action was filed in the Eastern District of Michigan (M.I.E.D.) in November 2022 and was transferred to the S.D.N.Y. on 08/04/2023 (23-cv-06881-UA). No briefing schedule has yet been issued in either matter, and the undersigned respectfully asks that a single briefing and argument schedule govern the matter as consolidated.

2. The two (2) district court (S.D.N.Y. and M.I.E.D.) cases (with nearly identical complaints) arise out of claims related to social media conspiracy theorist Jason Goodman and his use of the federal courts to further a for-profit “counter lawfare” fund and social media smear campaign solicited and advertised to members of the public. This is Goodman’s business, to abuse the courts with baseless lawsuits to achieve the collateral gains of reputation destruction against innocent third parties. See *Goodman v. Bouzy et al*, 1:21-cv-10878-AT-JLC, S.D.N.Y., Analisa Torres, presiding, date terminated: 06/29/2023.

3. These two actions involve closely related issues of law and fact (nearly identical). Both actions orbit Goodman’s social media for-profit smear factory that have attacked the plaintiff, his ex-wife, his handicapped son, his deceased father and several judges in the federal courts of the District of Columbia and produced junk legal documents declaring these judges were found guilty of “treason” and should have the appropriate penalty (“death”) imposed upon them.

LEGAL ARGUMENT

4. These two actions should be consolidated to spare judicial resources and promote efficient judicial administration. Pursuant to Federal Rule of Civil Procedure Rule 42(a) of the Federal Rules of Civil Procedure, “[i]f actions before the court involve a common question of law or fact, the court may: (1) join for hearing or trial any or all matters at issue in the actions; (2) consolidate the actions; or (3) issue any other orders to avoid unnecessary cost or delay. Fed. R. Civ. P. 42(a); see also *Devlin v. Transportation Communications International Union*, 175 F.3d 121, 130 (2d Cir. 1999) (“The Rule should be prudently employed as a valuable and important tool of judicial administration, invoked to expedite trial and eliminate unnecessary repetition and confusion.”) (internal quotation marks and citations omitted). “District courts enjoy substantial discretion in deciding whether and to what extent to consolidate cases.” *Hall v. Hall*, __ U.S. __, __, 138 S. Ct. 1118, 1131 (2018); see also *Johnson v. Celotex Corp.*, 899 F.2d 1281, 1284 (2d Cir. 1990) (same).”

5. The cases involve the same questions of law and fact: D. George Sweigert alleges numerous claims against Jason Goodman and his shell corporations known as Multimedia Systems Design, Inc, “CrowdSource The Truth” and 21st Century 3D. Both documents (Amended Complaint filed as ECF doc 12 on 01/23/2023 in the M.I.E.D. (ECF doc. 1 in 23-cv-06881-UA) and ECF doc. 1 file 07/04/2023) were compared via an on-line PDF document service, which indicated that they are both substantially the same.

CONCLUSION

For the foregoing reasons, the two actions should be consolidated.

August 6, 2023 (08/06/2023)

D. Swart

**D. G. SWEIGERT PRO SE PLAINTIFF, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

CERTIFICATE OF SERVICE

It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

truth@crowdsourcethetruth.org

Georg.webb@gmail.com

Certified under penalties of perjury.

August 6, 2023 (08/06/2023)



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